

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	CRIMINAL NO. EP-13-CR-0370-DCG
MARCO ANTONIO DELGADO,)	
)	
)	
)	
Defendant.)	

AMENDED JOINT ADMISSIBILITY OF EXHIBITS

The United States, by and through the United States Attorney for the Western District of Texas, and the undersigned Assistant United States Attorneys, and Defendant Marco Delgado, by and through his attorneys Maureen Scott Franco, Federal Public Defender, and Erik Anthony Hanshew, Assistant Federal Public Defender, respectfully submit the parties' Joint Exhibit List.

The Defendant does not oppose the introduction of certified domestic records of regularly conducted activity accompanied by a self-proving affidavit, pursuant to Fed. R. Evid. 902(11). The Defendant opposes the introduction of certain foreign records received pursuant to Mutual Legal Assistance Treaties (MLATs). The Defendant does not oppose the admissibility of the remaining exhibits on the condition that the documents are properly authenticated pursuant to Fed. R. Evid. 901 or 902.

GOVERNMENT'S PROPOSED EXHIBIT LIST

Number	Exhibit	Admitted	Witness
1	Turks & Caicos Account records (from MLAT)		

Number	Exhibit	Admitted	Witness
2	SUMMARY CHART - Turks & Caicos Account records		
3	Articles of Incorporation for FGG Enterprises, LLC (April 3, 2009)		
4	Special Power of Attorney by Gireud to Delgado, July 13, 2009		
5	EMAIL 6/10/2009 Delgado to Williams, copying Ponce, re: "FGG Bid Package"		
6	EMAIL 7/30/2009 Delgado to Ponce, re: "Apostilles and Power of Attorney"		
7	Teaming Agreement between MPSA and FGG, dated 8/8/2009, with Amendment		
8	Memorandum of Understanding between FGG and Delgado & Associates, 9/16/2009		
9	FGG's Bid for Agua Prieta II Project, Economic Proposal, 10/20/2009		
9A	Translation of Exhibit 9		
10	EMAIL 11/20/2009 Delgado to Ponce, re: "Letter of Credit"		
11	EMAIL 11/27/2009 Adams to Gireud, re: "Agua Prieta Award Letter"		
12	Subcontract for Acquisition of Goods between FGG and MPSA, 12/16/2009		
12A	Translation of Exhibit 12		
13	EMAIL 12/24/2009 Delgado to Ponce, re: "CFE Equipment Contract"		
14	EMAIL 12/28/2009 Ponce to Gireud, copying Delgado, re: "FGG Concerns Adams Letter 091228.pdf"		
15	EMAIL 12/30/2009 Delgado to Gireud and Miller, re: "Adams draft ltr"		
16	EMAIL 12/31/2009 Gireud to Ponce, re: "Agua Prieta Project," with attachments		

Number	Exhibit	Admitted	Witness
17	EMAIL 12/31/2009 Delgado to Ponce, re: "Agua Prieta Project"		
18	Contract for Acquisition of Goods between FGG, Banco Nacional, and Fideicomiso, with appearance of CFE, 1/6/2010, pages 1-21 (from MLAT)		
18A	Translation of Exhibit 18		
19	Attachment S to Contract for Acquisition of Goods (from MLAT)		
19A	Translation of Exhibit 19		
20	Attachment T to Contract for Acquisition of Goods (from MLAT)		
20A	Translation of Exhibit 20		
21	Two-paragraph Letter, 1/10/2010, re: Pledge (from MLAT)		
22	Three-paragraph Letter, 1/10/2010, re: Pledge		
23	John Adams passport		
24	John Adams crossing records		
25	IACE travel records		
26	MPSA expense records		
27	T-Mobile Records for John Adams' MPSA phone, Dec. 2009		
28	T-Mobile Records for John Adams' MPSA phone, Jan. 2010		
29	Irais Davila's notary book (Book 1)		
30	Irais Davila's notary book (Book 2)		
31	LETTER 5/20/2012 Ramos to FGG, Att'n Delgado		
31A	Translation of Exhibit 31		
32	Contract for Pledge Without Transfer of Possession, 1/15/2010 (from MLAT)		
32A	Translation of Exhibit 32		

Number	Exhibit	Admitted	Witness
33	Power of Attorney, 1/11/2010		
34	EMAIL 1/12/2010 Ponce to Gireud, copying Delgado, re: "FGG Clarifications Letter 100112.pdf"		
35	EMAIL 1/12/2010 Delgado to Miller, forwarding 1/12/2010 letter from Adams		
36	EMAIL 1/12/2010 Delgado to Gireud, re: "Itinerary ing buendia.docx"		
36A	Translation of Exhibit 36		
37	EMAIL 1/18/2010 Ponce to Gireud, copying Delgado, re: "FGG Clarifications Letter 100112.pdf"		
38	EMAIL 1/24/2010 Ponce to Gireud and Delgado, re: "CFE-FGG Equipment Sales Contract"		
39	ANEXO W		
40	EMAIL 2/11/2010 Gireud to Ponce, copying Delgado, re: "JA response letter," with attachment		
40A	Translation of Exhibit 40		
41	EMAIL 2/12/2010 Beddard to Gireud, re: "AGUA-FGG/MPSA Payment Schedule Invoice Submittal Notification"		
42	EMAIL 3/2/2010 Gireud to Ponce, copying Delgado, re: "Request for Assignment of Collection"		
43	LETTER 3/3/2010 Delgado to Ramos (CFE), for funds to be paid to Turks & Caicos Account (from MLAT)		
43A	Translation of Exhibit 43		
44	EMAIL 3/3/2010 Ueki to Gireud, re: "Agua Prieta," with attachment		
45	EMAIL 3/8/2010 Delgado to Miller, Gireud, Ponce, re: "Request for Assignment of Collection Rights"		
45A	Translation of Exhibit 45		

Number	Exhibit	Admitted	Witness
46	TRANSMISSION 3/8/2010, \$20 million transferred to Turks & Caicos Account (from MLAT)		
46A	Translation of Exhibit 46		
47	EMAIL 3/12/2010 Delgado to Ponce, re: "Running of Payments"		
47A	Translation of Exhibit 47		
48	EMAIL 3/22/2010 Gireud to Ponce, copying Delgado, re: "CFE Adjusted Payment Schedule and effect on MPSA-FGG"		
49	LETTER 3/23/2010 Buendia to Delgado, re: Rescheduling of Payments, ST/019		
50	EMAIL 3/25/2010 Delgado to Adams, Gireud, and Miller, re: "Rescheduling of Payments"		
50A	Translation of Exhibit 50		
51	LETTER re: Payment to FGG from CFE		
52	EMAIL 3/26/2010 Delgado to Adams, Gireud, and Miller, re: "Wire Transfer Instructions and Brief Status Report"		
53	LETTER 3/30/2010 Buendia to Delgado, re: "Assignment of First Payment," ST/020		
53A	Translation of Exhibit 53		
54	EMAIL 4/1/2010 Beddard to Gireud, copying Delgado, re: "MPSA Invoice Payment"		
55	EMAIL 4/1/2010 Beddard to Gireud, copying Adams and Ponce, re: "MPSA Invoice Payment"		
56	EMAIL 4/3/2010 Pone to Gireud, re: "FGG"		
57	EMAIL 4/5/2010 Beddard to Gireud, re: "MPSA Invoice First Payment"		
58	EMAIL 4/5/2010 Gireud to Ponce, copying Delgado, re: "FGG"		
59	EMAIL 4/6/2010 Williams to Gireud, copying Delgado, re: "Urgent"		

Number	Exhibit	Admitted	Witness
60	EMAIL 4/6/2010 Gireud to Adams, "Assignment First Payment.pdf"		
60A	Translation of Exhibit 60		
61	EMAIL 4/7/2010 Adams to Gireud, re: "letter"		
62	EMAIL 4/12/2010 Delgado to Adams, re: "MPSA_FGG Payment Term Agreement"		
63	EMAIL 4/13/2010 Altamura to Delgado, re: "Agua Prieta - FGG - MPSA Subcontract"		
64	EMAIL 4/14/2010 Delgado to Altamura, re: "FGG-MPSA Subcontract"		
65	EMAIL 4/14/2010 Altamura to Delgado, re: "FGG-MPSA Subcontract"		
66	Revocation of Special Power of Attorney, by Gireud, 4/14/2010		
67	EMAIL 4/20/2010 Beddard to Gireud, re: "AGUA-FGG/Subcontract," with attachment "April Invoice 002.pdf"		
68	EMAIL 4/20/2010 Beddard to Gireud, re: "AGUA-FGG/Subcontract"		
69	EMAIL 4/23/2010 Altamura to Gireud and Miller, copying Delgado, re: "AGUA-FGG/Subcontract"		
70	EMAIL 4/23/2010 Altamura to Miller and Gireud, copying Delgado, re: "Amendment 1 to Subcontract between FGG and MPSA"		
71	EMAIL 4/23/2010, Gireud to Altamura, with attachment, "Amendment 1"		
72	Amendment No. 1 to Subcontract between FGG and MPSA, Apr. 23, 2010		
73	LETTER 5/7/2010 Gireud to Beddard, re: "Communication with CFE"		
74	EMAIL 5/8/2010 Beddard to Gireud, re: "Letter"		
75	EMAIL 5/10/2010 Gireud to Beddard, copying Delgado, re: "AGUA-FGG/Subcontract"		

Number	Exhibit	Admitted	Witness
76	EMAIL 5/10/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Subcontract"		
77	LETTER 5/11/2010 Gireud to Laris (CFE), re: account		
77A	Translation of Exhibit 77		
78	EMAIL 5/13/2010 Beddard to Delgado, re: "RM: Balance 100% Agua Prieta"		
79	EMAIL 5/14/2010 Beddard to Delgado, re: "AGUA-FGG/Solar 12MW Steam Admission," with attachments		
80	EMAIL 5/14/2010 Beddard to Delgado, re: "Engineering & Construction Action Item List"		
81	EMAIL 5/16/2010 Beddard to Delgado, re: "Agua Prieta Engineering"		
82	EMAIL 5/18/2010 Beddard to Gireud, copying Delgado, re: "Invoice Submittal Notification"		
83	EMAIL 6/17/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/ Communications with CFE under Acquisition Contract"		
84	TRANSMISSION 7/6/2010, \$12 million transferred to Turks & Caicos Account (from MLAT)		
85	EMAIL 7/9/2010 Delgado to Narvaez, "Sending Project Contract"		
85A	Translation of Exhibit 85		
86	EMAIL 7/13/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/2nd Invoice Payment Reminder"		
87	LETTER 7/15/2010 Gireud to Delgado, re: 2nd CFE Payment Disbursements		
88	EMAIL 10/9/2010 Delgado to Beddard, re: "Postponement of CFE 10/13/10 Meeting"		
89	EMAIL 10/19/2010 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Notice of Breach of Contract"		

Number	Exhibit	Admitted	Witness
90	LETTER 10/26/2010 Buendia to Delgado, re: "Partial Retention of Second Payment," ST/026		
90A	Translation of Exhibit 90		
91	EMAIL 2/22/2011 Delgado to Gireud, copying Beddard		
92	EMAIL 2/24/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title"		
93	EMAIL 2/24/2011 Altamura to Miller, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title"		
94	EMAIL 2/25/2011 Delgado to Gireud, re: "Borrador a kevin"		
95	EMAIL 2/28/2011 Delgado to Gireud, copying Miller, re: "For your review"		
96	EMAIL 2/28/2011 Miller to Beddard, copying Delgado, "Questions regarding Pledge"		
97	EMAIL 2/28/2011 Beddard to Miller, copying Delgado, re: "Questions regarding Pledge"		
98	EMAIL 3/1/2011 Delgado to Miller, re: "Questions regarding pledge"		
99	EMAIL 3/1/2011 Miller to Beddard, copying Delgado, re: "Questions regarding Pledge"		
100	EMAIL 3/1/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title Rev 1"		
101	EMAIL 3/1/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Urgent Clarification of Equipment Title Rev 1"		
102	EMAIL 3/6/2011 Beddard to Delgado, re: "J Adams Letter 28th Dec 2009," with attachment (12/28/2009 Adams Letter)		
103	EMAIL 3/7/2011 Delgado to Beddard, re: "J Adams Letter 28th Dec 2009"		

Number	Exhibit	Admitted	Witness
104	EMAIL 3/7/2011 Delgado to Beddard, re: "Assignment of Collection rights"		
105	EMAIL 3/10/2011 Burgueno to Delgado, copying Altamura, re: "Assignment of Collection Rights"		
106	EMAIL 3/17/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Confidential Information Request"		
107	EMAIL 3/17/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Pledge of Equipment"		
108	EMAIL 3/21/2011 Miller to Beddard, copying Delgado, re: "Pledge"		
109	EMAIL 3/24/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Pledge of Equipment"		
110	EMAIL 3/24/2011 Delgado to Beddard, re: "AGUA-FGG/Pledge of the Equipment property of Mitsubishi Power Systems America"		
111	EMAIL 3/28/2011 Delgado to Beddard, re: "Confirmacion Prenda 03-05-11.doc"		
112	EMAIL 3/28/2011 Delgado to Beddard, re: "Signed Info Request"		
112A	Translation of Exhibit 112		
113	EMAIL 3/29/2011 Beddard to Gireud, copying Delgado, re: "AGUA-FGG/Pledge of the Equipment property of [MPSA]"		
114	EMAIL 3/30/2011 Delgado to Gireud, re: "AGUA-FGG/Breach of Contract"		
114A	Translation of Exhibit 114		
115	EMAIL 3/30/2011 Beddard to Miller, copying Delgado, re: "Collection Rights"		
116	EMAIL 3/30/2011 Miller to Altamura, copying Gireud, re: "FGG Collection Rights to MPSA"		
116A	Translation of Exhibit 116		

Number	Exhibit	Admitted	Witness
117	EMAIL 4/8/2011 Delgado to Beddard, re: "AGUA-FGG/Breach of Contract"		
118	EMAIL 4/8/2011 Delgado to Miller & Gireud, re: "AGUA-FGG/Confidential Information Request"		
119	EMAIL 4/8/2011 Miller to Delgado & Gireud, re: "Agua Prieta"		
120	EMAIL 4/8/2011 Delgado to Miller & Gireud, re: "Agua Prieta"		
121	EMAIL 4/10/2011 Delgado to Beddard, re: "AGUA-FGG/Confidential Information Request"		
122	EMAIL 4/10/2011 Altamura to Delgado, re: "AGUA-FGG/Breach of Contract"		
123	EMAIL 4/11/2011 Delgado to Altamura, re: "Collection Rights - Agua Prieta II"		
124	EMAIL 4/11/2011 Altamura to Delgado, re: "AGUA-FGG/Breach of Contract"		
125	EMAIL 4/12/2011 Delgado to Altamura, re: "FGG-MPSA Proposed meeting"		
126	EMAIL 4/15/2011 Delgado to Moreno (CFE), re: "Derechos de Cobranza Mitsubishi"		
126A	Translation of Exhibit 126		
127	EMAIL 4/15/2011 Morendo to Delgado, re: "Derechos de Cobranza Mitsubishi"		
127A	Translation of Exhibit 129		
128	EMAIL 7/1/2011 Delgado to Gireud, re: "LETTERS OF CREDIT"		
128A	Translation of Exhibit 128		
129	EMAIL 7/21/2011 Miller to Delgado & Gireud, re: "Transportation and impending disaster"		
130	EMAIL 8/1/2011 Gireud to Delagdo, re: "LTSA Status"		

Number	Exhibit	Admitted	Witness
131	EMAIL 10/11/2011 Delgado to Miller & Gireud, re: "Agua Prieta"		
132	EMAIL 11/9/2011 Delgado to Miller & Gireud, re: "Status of Contract"		
133	LETTER 3/1/2012 CFE to Gireud		
133A	Translation of Exhibit 133		
134	Text Messages between Gireud and Delgado, 1/13/2012 - 8/9/2012		
134A	Translation of Exhibit 134		
135	Power of Attorney by Gireud, 3/8/2012		
136	Form 1099 (Miscellaneous Income) from FGG to Delgado, for year 2010, \$820,000,		
137	Form 1099 (Miscellaneous Income) from FGG to Delgado, for year 2011, \$965,000		
138	Power of Attorney by Gireud, 6/10/2012		
139	Linda Medlock Emails		
140	EMAIL 6/3/2010 Delgado to Architect		
140A	Translation of Exhibit 140		
141	EMAIL 1/21/2011 Architect to Delgado, with attached invoice		
141A	Translation of Exhibit 141		
142	Standard Charter records re: wires		
143	Wells Fargo records re: wires		
144	Wells Fargo records for FGG's account		
145	Wells Fargo records for Linda Medlock's account		
146	Charlotte's Furniture records		
147	Rio Bravo Title records		

Number	Exhibit	Admitted	Witness
148	Rudolph Chevrolet records		
149	Land Rover of Albuquerque, NM records		
150	First New Mexico Title records (for Kandahar Condominium)		
151	Carnegie Mellon records		
152	Bowdoin College records		
153	Photos of Kandahar Apt. #19		
154	Photo of Jeep		
155	Photo of Range Rover		
156	Photo of Suburban		
157	Photos of 1109 Cerrito Feliz		
158	Wells Fargo records re: Transmission		

The Government opposes the admissibility of the documents indicated below based upon relevance and/or hearsay. The Government reserves its right to object to documents marked with an asterisk (*) subject to viewing the documents.

DEFENDANT'S PROPOSED EXHIBIT LIST

Exhibit No.	Description	Offered	Admitted	Gov't Objection ?
1.	Letter-Federal Electricity Commission Official, Doc. No. SCC/2011/067, 03/24/11-ENGLISH			
1a.	Letter-Federal Electricity Commission Official, Doc. No. SCC/2011/067, 03/24/11-SPANISH			
2.	Letter of Presentation Proposal, 10/20/09-ENGLISH			
2a.	Letter of Presentation Proposal,			

	10/20/09-SPANISH			
3.	Letter from GIREUD to EUGENIO, 05/11/10-ENGLISH			
3a.	Letter from GIREUD to EUGENIO, 05/11/10-SPANISH			
4.	Letter Federal Electricity Commission, Official Doc. No. SCC/2011/063, 02/18/11-ENGLISH			
4a.	Letter Federal Electricity Commission, Official Doc. No. SCC/2011/063, 02/18/11-SPANISH			
5.	Letter from Marco Delgado to Ramos Elorduy, 03/03/10-ENGLISH			
5a.	Letter from Marco Delgado to Ramos Elorduy, 03/03/10-SPANISH			
6.	Minutes for the Extraordinary Session Number 10/2009, 12/23/09-ENGLISH			
6a.	Minutes for the Extraordinary Session Number 10/2009, 12/23/09-SPANISH			
7.	First Amendment Agreement to the Contract of Acquisition No. FAGP- 001/2009 with Annex 1 & 2, 12/23/09- ENGLISH			
7a.	First Amendment Agreement to the Contract of Acquisition No. FAGP- 001/2009 with Annex 1 & 2, 12/23/09- SPANISH			
8.	Contract for Guarantee Services Guaranteeing Functionality of Gas Turbine Generators (Long Term Service Agreement), 01/06/10- ENGLISH			
8a.	Contract for Guarantee Services Guaranteeing Functionality of Gas Turbine Generators (Long Term Service Agreement), 01/06/10- SPANISH			
9.	Annex D- Ceremony of Presentation and Opening of Proposals/Bi, 10/20/09- ENGLISH			
9a.	Annex D- Ceremony of Presentation and Opening of Proposals/Bi, 10/20/09- SPANISH			
10.	Annex E- Award of Contract- ENGLISH			

10a.	Annex E- Award of Contract- SPANISH			
11.	Annex F- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator, 12/07/09-ENGLISH			
11a.	Annex F- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator, 12/07/09-SPANISH			
12.	Annex G- Agreement for an Extension of the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality Turbine Generators,12/06/09-ENGLISH			
12a.	Annex G- Agreement for an Extension of the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality Turbine Generators, 12/06/09-SPANISH			
13.	ANNEX Q-Map of site location- ENGLISH			
13a.	ANNEX Q- Map of site location- SPANISH			
14.	Annex K-Form for written declaration by residents abroad that the winning bidder awarded the contract must submit prior to the execution of the contract; Request for Opinion with regards to the compliance of Fiscal Obligations related to Contracting with the Federal Government and the States, 12/2009-ENGLISH			
14a.	Annex K-Form for written declaration by residents abroad that the winning bidder awarded the contract must submit prior to the execution of the contract; Request for Opinion with regards to the compliance of Fiscal Obligations related to Contracting with the Federal Government and the States,12/2009-SPANISH			
15.	Annex L- Publication of Bid in the <i>Diario</i> , 03/26/09-ENGLISH			
15a.	Annex L- Publication of Bid in the			

	<i>Diario</i> , 03/26/09-SPANISH			
16.	Annex R- Program of RFP Events-ENGLISH			
16a.	Annex R- Program of RFP Events-SPANISH			
17.	Annex S- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator-ENGLISH			
17a.	Annex S- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator-SPANISH			
18.	Annex T with Annex 14-Guarantee of Compliance Form-ENGLISH			
18a.	Annex T with Annex 14-Guarantee of Compliance Form-SPANISH			
19.	Annex U with Annex 13- Guarantees and Conventional Sanctions-ENGLISH			
19a.	Annex U with Annex 13- Guarantees and Conventional Sanctions-SPANISH			
20.	Annex V- Second Agreement for an Extension to the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality of Turbine Generators-ENGLISH			
20a.	Annex V- Second Agreement for an Extension to the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality of Turbine Generators-SPANISH			
21.	Annex 13- Guarantees and Conventional Sanctions-ENGLISH			
21a.	Annex 13- Guarantees and Conventional Sanctions-SPANISH			
22.	Miranda Form			Yes
23.	ROI 1			Yes
24.	ROI 16			Yes
25.	Consent to Search I-Phone			Yes
26.	Cerrito Feliz Purchase Docs			
27.	Charlotte's Docs			
28.	Memorandum of Understanding-FGG			
29.	Mack Massey			
30.	Linda Medlock Scans			

31.	CFE Wire Trans and Rerouting 03/03/10			
32.	Mits Correspondence 10/28/09			
33.	Rudolph Docs			
34.	Turks and Caicos- Rutley Affidavit, 01/28/13			
35.	Email Re: First Caribbean Bank Docs from AUSA Arreola to Former Defense Counsel, 07/17/13			Yes
36.	Email Re: Discovery from AUSA Arreola to Former Defense Counsel, 09/25/13			
37.	Carnegie Melon Response to Summons, 12/04/12			
38.	Email, Gireud 07/01/11			
39.	Land Rover Documents			
40.	MVD-New Mexico Records			
41.	Direct Buy Response to Summons			
42.	Gireud Thumb Drive			
43.	Mitsubishi Contract-SPANISH 01/24/12			
44.	FGG Correspondence Re: Wells Fargo Credit, 05/11/10			
45.	FGG, SPANISH 03/03/10			
45a.	FGG, ENGLISH, 03/03/10			
46.	FGG Invoice, 06/29/10 SPANISH			*
46a.	FGG Invoice, 06/29/10 ENGLISH			*
47.	Fiduciary Office, 03/07/12 SPANISH			*
47a.	Fiduciary Office, 03/07/12 ENGLISH			*
48.	FGG Economic Proposal-SPANISH			
48a.	FGG Economic Proposal-ENGLISH			
49.	CFE Sec 6 Contract			
50.	Amendment 1-FGG & Mitsubishi 04/23/10			
51.	CFE Correspondence Re: Financing 03/01/12			
52.	FGG POWER OF ATTORNEY 03/08/12			
53.	SPECIAL POWER OF ATTORNEY- MD 07/13/09			
54.	FGG Business Entity Information			
55.	Three Party Agreement for CFE Agua Prieta II and Book of Draft			Yes
56.	CFE Correspondence Re: Contract 02/18/11			*

57.	CFE Correspondence Re: Contract 03/24/11			
58.	Amendment-Re: CFE and FGG, 04/22/11-SPANISH & ENGLISH			*
59.	FGG Corres. Re: Financing Offer			*
60.	FGG Corres. Re: Receipt of Payment 07/15/09			
61.	Email From MD to FJG Re: Breach of Contract 03/30/11			
62.	Email from MD to Kevin Beddard Re: Confidential Info Request 03/17/11			
63.	Email from FJG to MD Re: Sulzer Merged Agreement 04/15/11			Yes
64.	Email from FJG to MD Re: Sulzer Merged Agreement ii 04/22/11			Yes
65.	Email from FJG to MD Re: Assignment of Collections to MPSA 04/15/11			
66.	Phone Texts Mobile: 915-929-1930, I-Phone: 915-667-1882 SPANISH			
66a.	Phone Texts Mobile: 915-929-1930, I-Phone: 915-667-1882 ENGLISH			
67.	Mitsubishi Corres. To FJG Re: Equipment Contract 01/12/10			
68.	Photo Taos Condo			
69.	Photos of Jeep, Range Rover			
70.	Photos of 1109 Cerrito Feliz- 09/27/13			
71.	Bank Records Re: FGG Account, IOLTA Account, MD Account, PMA Account, and Narvaez Account			
72.	ROI 12 02/16/12 Re: Meeting with SA and MD on 10/28/11			Yes
73.	Bank Records from Standard Charter: Business Record Affidavit, 10/15/13			
74.	Wells Fargo Records Acct 4733, 01/22/14			
75.	Email Re: Revised Payment Plan 03/25/10			
76.	Email Re: Formal Assignment Request 04/15/11			
77.	Email Re: When to call 03/12/10			
78.	Email Re: CFE Acknowledgement of Formal FGG Request 03/08/10			
79.	Email Re: Format of Wire Transfer 03/26/10			
80.	Email (03/25/10) Re: Color Doc Assignment and correspondence re:			

	Payment to FGG from CFE(03/24/10)			
81.	Email Re: JA Letter (02/11/10) and correspondence re: CFE-FGG Equipment Contract (01/30/10)			
82.	Email (04/06/10) Re: CFE Letter and correspondence to MD from CFE 03/30/10			*
83.	Email Re: Agua-FGG Subcontract 05/10/10			
84.	Email Re: FGG 04/04/10			
85.	Email (03/03/10) Re: MPSAs Protests and correspondence from MPSA (03/03/10)			
86.	Email Re: FGG Collection Right to MPSA 03/30/11 and executed Assignment of Collection Rights			
87.	Email Re: CFE Assignment 03/11/10			
88.	Email Re: FGG-MPSA (04/07/10) and FGG Correspondence Re Payment to MPSA (04/06/10)			
89.	Business Record Affidavit and attachments- Wells Fargo 10/17/13			
90.	MPSA Lawsuit v. FGG, FG, and MD- 2012 and Attachments			Yes
91.	Wells Fargo Correspondence Re: Subpoena 11/07/13			
92.	Sulzer v. FGG Original Petition			Yes
93.	Email (06/09/11) Tania Mendez Re: CFE Documents and Executed Amendment of Collection (06/09/11)			Yes
94.	FGG Correspondence to Sulzer (Pardivala) 03/08/11			Yes
95.	FGG Authorization, 06/09/11			Yes
96.	Power of Attorney FGG, 06/10/12			
97.	Order Granting Selzer Motion to Compel, 03/17/13,			Yes
98.	Miller First Supp Responses to RFP, 06/17/13			Yes
99.	Email Re: Agua Prieta Project 01/05/10			
100.	Email (01/12/10) Re: FGG Clarifications Letter and FGG Correspondence (01/12/10)			
101.	Email Re: Itinerary 01/12/10			
102.	Email Re: Agua Prieta II 02/07/11			
103.	Email Re: FGG TSUSH Letter of Intent Draft 02/17/11			Yes

104.	Email Re: Contract for Services 02/17/011			
105.	Email Re: FGG-FEB-11 02/21/11			
106.	Email Re: AGUA-FGG Urgent Clarification of Equipment Title, 02/24/11			
107.	Email Re: Borrador a Kevin 02/25/11			
108.	Email Re: Review of Letter to Kevin 02/28/11			
109.	Email Re: Questions Regarding Pledge 02/28/11			
110.	Email Re: AGUA-FGG 2 nd Delay Notice 03/11/11			
111.	Email Re: Agua Prieta 04/08/11			
112.	Email Re: AGUA-FGG Breach of Contract: Request for Authorization for the Assignment of collection rights 04/10/11			
113.	Email Re: agreement Agua Prieta 05/08/09			*
114.	Email Re: MX-311N Answers to Questions 05/30/11			*
115.	Email Re: Collection of Rights,03/30/11			
116.	Exclusivity and Non-Circumvention Agreement Thomassen Amcot-FGG, 04/20/09			
117.	CFE Correspondence 05/18/11			*
118.	Revocation of Special Power of Attorney – FJG 04/14/10			
119.	FGG Correspondence Re: Well Fargo 05/11/10			
120.	FGG Correspondence Re: 2 nd CFE Payment Disbursements- Agua Prieta II 07/15/10			
121.	FGG Correspondence 03/22/10			
122.	Addendum to Teaming Agreement FGG and Mitsubishi 08/11/09			
123.	FGG Correspondence, 12/10/09			*
124.	FGG Correspondence Re: Confidentiality Agreement 07/14/09			*
125.	Email Re: Meeting 03/29/11			*
126.	FGG Correspondence Beddard to Miller, Re: Agua Prieta II-Various,			*

	11/11/10			
127.	CFE Correspondence CFE to Mits. 08/26/11			*
128.	Email Re: Collection Rights 03/30/11			
129.	Email Re: Obtaining Counsel, 04/08/11			
130.	Email Re: Transportation and Disaster 07/21/11			
131.	FGG Correspondence Re: Contract 03/28/11			
132.	CFE Correspondence 10/26/10			
133.	CFE Correspondence 03/03/10			
134.	FGG 2010 1099 Tax Form			
135.	FGG 2011 1099 Tax Return			
136.	Email to Altamura from Kevin Beddard 3/28/11 with FGG Correspondence 03/28/11 SPANISH			
136a.	Email to Altamura from Kevin Beddard 3/28/11 with FGG Correspondence 03/28/11- ENGLISH			
137.	Linda Medlock emails			
138.	John Adams Passport			
139.	John Adams Border Crossing			
140.	Bancomext			
141.	Notary Book 1- Arais Davila			
142.	Notary Book 2- Arais Davila			
143.	Credit Card Transactions Provided by Linda Medlock			
144.	FGG Ent LLC Provided by F. Gireud, 12/16/09			
145.	Emails Provided by F. Gireud			*
146.	1099's Provided by F. Gireud			
147.	Def FJG Responses			Yes
148.	Def FJG Supp Response to RFP			Yes
149.	Mace Miller Object and Res to RFP Re: Venue			Yes
150.	Sulzer Docs Re: Responses to RFP 10/31/12			Yes
151.	Correspondence From Haynes & Boone, 11/01/12			Yes
152.	Correspondence dated 11/29/11 to Linda Medlock from Steve James Re: IRS			Yes
153.	Correspondence and draft to Marco Delgado from Linda Medlock w/IRS Docs 11/10/11			

154.	Correspondence to Linda Medlock, 07/05/11 from Susan Urbieto, Atty Re: Child Support and additional child support documents			Yes
155.	Documents from Bowdoin College			
156.	Subcontracto de Adquisicion de Bienes y Anexos, 1216- SPANISH			
156a.	Subcontracto de Adquisicion de Bienes y Anexos, 1216- ENGLISH			
157.	Travel Documents			
158.	Special Power of Attorney, 01/11/2010			
159.	Ponce Email with Anexo S and Chart, 03/15/10			
160.	John Adams Cell Records from Dec 2009 to Jan 2010			
161.	CFE AUDIT			Yes
162.	Discovery Letter, 05/09/16			Yes
163.	Gov't Proffer Letters, 05/09/16, 09/12/12, 08/01/12, 11/06/12			Yes
164.	"Contrato De Adquisiciones" with Official Stamps, 01/06/10			
165.	ROI'S 9, 17, 19, 24, 33, 34, Brady/Giglio Source			Yes
166.	Corres Skipplings Rutley, 03/23/10			
167.	Checks to Mace Miller and Gireud, 05/20/09			
168.	Check Linda Medlock, 04/19/10			
169.	Checks to Joe Montes, Liliana Narvaez, Ray Velarde, Chris Parker, 2012;			Yes
170.	Order for Issuance of Witness Subpoena <i>Ad Testificandum and Duces Tecum</i> for Mitsubishi Power Systems Americas, Inc.'s Custodian of Records, March 4, 2016			Yes
171.	Order for Issuance of Witness Subpoena <i>Ad Testificandum and Duces Tecum</i> for Fernando Gireud, March 4, 2016			Yes
172.	Mitsubishi/CFE Agreement October 2013			Yes
173.	Linda Medlock EMAILS			

Dated: September 9, 2016

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By: _____/s/

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2016, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System, which will send notice to counsel of record.

_____/s/
Debra P. Kanof
Assistant United States Attorney